

## **REMARKS**

Applicant respectfully requests reconsideration and allowance of the subject application. Claims 1-10, 12-13, 15-16 and 18-20 are pending in the application. Claims 1, 6, 12 and 18 are independent claims. The amendments to the claims presented herein are made solely for the purpose of expediting the prosecution of the instant Application. Applicant respectfully traverses the rejections of the current Office Action.

### **Claim Rejections Under 35 U.S.C. § 101**

**Claims 6-11** stand rejected under 35 U.S.C. § 101. Applicant respectfully submits that at least the amendments to claims 6-10 (claim 11 canceled) render the rejection moot. Accordingly, the Office is respectfully requested to withdraw the 35 U.S.C. § 101 rejection.

### **Claim Rejections Under 35 U.S.C. § 102**

**Claims 1-2, 4-6, 9-11, 18 and 20-21** stand rejected under 35 U.S.C. § 102(b) as being anticipated by Li et al. "Building and Using A Scalable Display Wall System", 2000 IEEE (hereinafter "Li"). Applicant respectfully traverses the rejection.

As indicated, several rejected claims are canceled hereby. Thus, the rejections of the canceled claims are not discussed in further detail herein.

**Amended independent claim 1** recites:

A method comprising:  
receiving video data over a network from a network computer, the video data formatted for display on a large display;  
*receiving configuration information respectively from a plurality of clients, each of the received configuration information including attribute information associated with a small display that is part of the large display;*  
*reformatting the video data on an intermediate computer for display on a number of the small displays that are part of the large display;* and  
distributing reformatted video data from the intermediate computer to at least some of the small displays.  
(Emphasis added.)

Applicant carefully considered the entire text of Li and was unable to find any disclosure that anticipates at least "receiving configuration information respectively from a plurality of clients, each of the received configuration information including attribute information associated with a small display that is part of the large display" and "reformatting the video data on an intermediate computer for display on a number of the small displays that are part of the large display," as recited in the above-reproduced claim 1.

Li discloses a system that provides a large-display using several conventional components. The system includes a display cluster that includes multiple computers that each drive a projection device. (*See Figure 1 of Li.*) However, the Li system does not include a computer to receive "configuration information individually from a plurality of clients," as is recited in claim 1. Rather, each computer in the Li display cluster includes a "scene database" (*See page 34, first column, lines 1-2*) from which a respective computer retrieves video data for rendering and display. More specifically, each computer in the Li display

cluster does its own reformatting of the video data for display on the large display. Thus, because Li recites that each of the computers in the display cluster is responsible for its own rendering and display, it follows that those computers would not distribute "configuration information" that enables "an intermediate computer" to reformat video data, as is claimed in claim 1.

Therefore, for at least the reasons stated above, Applicant respectfully requests the Office to reconsider and withdraw the rejection of claim 1.

**Dependent claims 2 and 4** depend from claim 1. The rejection with regard to these claims should be withdrawn by virtue of the dependency. Moreover, these claims recite features that, when taken together with those of claim 1, are not disclosed by Li.

**Amended independent claim 6** recites:

A processor-readable medium storing processor-executable instructions configured for:

*receiving, at an intermediate computer, configuration information respectively from a plurality of clients, each of the received configuration information including attribute information associated with a separate small display that is part of a large display;*

receiving video data over a computer network at the intermediate computer, the video data configured for display on the large display;

*reconfiguring the video data for display on the small displays in accordance with the configuration information;*  
and

sending reconfigured video data from the intermediate computer to the small displays. (Emphasis added.)

Applicant carefully considered the entire text of Li and was unable to find any disclosure that anticipates at least "receiving, at an intermediate computer, configuration information respectively from a plurality of clients, each of the

received configuration information including attribute information associated with a separate small display that is part of a large display" and "reconfiguring the video data for display on the small displays in accordance with the configuration information," as recited in the above-reproduced claim 6.

Li discloses a system that provides a large-display using several conventional components. The system includes a display cluster that includes multiple computers that each drive a projection device. (*See Figure 1 of Li.*) However, the Li system does not include a computer to receive "configuration information individually from a plurality of clients," as is recited in claim 6. Rather, each computer in the Li display cluster includes a "scene database" (*See page 34, first column, lines 1-2*) from which a respective computer retrieves video data for rendering and display. More specifically, each computer in the Li display cluster does its own reformatting of the video data for display on the large display. Thus, because Li recites that each of the computers in the display cluster is responsible for its own rendering and display, it follows that those computers would not distribute "configuration information" that enables "reconfiguring" video data, as is claimed in claim 6.

Therefore, for at least the reasons stated above, Applicant respectfully requests the Office to reconsider and withdraw the rejection of claim 6.

**Dependent claims 9 and 10** depend from claim 6. The rejection with regard to these claims should be withdrawn by virtue of the dependency. Moreover, these claims recite features that, when taken together with those of claim 6, are not disclosed by Li.

**Amended independent claim 18** recites:

A large display configuration computer comprising:  
a configuration module to:  
receive, over a computer network, video data formatted  
for a large display;  
*receive configuration data from a plurality client  
computers each having an associated display device, the  
configuration data received from each client computer  
including a physical location and a display resolution of the  
display device associated therewith; and*  
*reformat the video data formatted for the large display  
for display across the display devices associated with the  
plurality of client computers, the reformatting of the video  
data for the large display including dividing the video data  
into distinct video data portions that may be individually  
rendered on the display devices associated with the plurality  
of client computers.* (Emphasis added.)

Applicant carefully considered the entire text of Li and was unable to find any disclosure that anticipates at least the "receive" and "reformat" functionality associated with the claimed "configuration module."

Li discloses a system that provides a large-display using several conventional components. The system includes a display cluster that includes multiple computers that each drive a projection device. (*See Figure 1 of Li.*) However, the Li system does not include a computer to receive "configuration data from a plurality client computers," as is recited in claim 18. Rather, each computer in the Li display cluster includes a "scene database" (*See page 34, first column, lines 1-2*) from which a respective computer retrieves video data for rendering and display. More specifically, each computer in the Li display cluster does its own reformatting of the video data for display on the large display. Thus, because Li recites that each of the computers in the display cluster is responsible for its own rendering and display, it follows that those computers would not

distribute "configuration information" that enables the "configuration module" to reformat video data, as is claimed in claim 18.

Therefore, for at least the reasons stated above, Applicant respectfully requests the Office to reconsider and withdraw the rejection of claim 18.

**Dependent claim 20** depends from claim 18. The rejection with regard to this claim should be withdrawn by virtue of the dependency. Moreover, this claim recites features that, when taken together with those of claim 18, are not disclosed by Li.

*Claim Rejections Under 35 U.S.C. § 103*

**Claims 3 and 19** stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Li in view of Ellis et al., U.S. Patent No. 4,562,450 (hereinafter Ellis). **Claims 12-13 and 16-17** stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Li in view of Cok et al., U.S. Patent No. 6,999,045 B2 (hereinafter "Cok"). **Claims 7-8 and 14** stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Li in view of Cok, and further in view of Sakai et al., U.S. Patent No. 5,680,525 (hereinafter "Sakai"). **Claim 15** stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Li in view of Nishida, U.S. Patent No. 6,502,107 (hereinafter "Nishida"). Applicant respectfully traverses these rejections.

As indicated, several rejected claims are canceled hereby. Thus, the rejections of the canceled claims are not discussed in further detail herein.

**Claim 3** depends from claim 1 and hence incorporates the features of claim 1. As noted above, Li fails to disclose the limitations of claim 1. The added disclosure of Ellis does not remedy those shortcomings, nor does the rejection

make any assertion to that effect. Therefore, the proposed combination of Li in view of Ellis fails to suggest the recitation of claim 1, from which claim 3 depends. Moreover, this dependent claim recites features that, when taken together with those of claim 1, are not rendered obvious by the proposed combination.

**Claim 19** depends from claim 18 and hence incorporates the features of claim 18. As noted above, Li fails to disclose the limitations of claim 18. The added disclosure of Ellis does not remedy those shortcomings, nor does the rejection make any assertion to that effect. Therefore, the proposed combination of Li in view of Ellis fails to suggest the recitation of claim 18, from which claim 19 depends. Moreover, this dependent claim recites features that, when taken together with those of claim 18, are not rendered obvious by the proposed combination.

**Amended independent claim 12 recites:**

A system comprising:

a number of small displays assembled as a large display, a size and a resolution of the large display being scalable by altering the number of small displays; and

*a gateway computer configured to reformat large display video data appropriate for display on the large display into small display video data appropriate for display on the small displays depending on how the small displays are assembled, the gateway computer including a configuration module to receive identification information, location information, and resolution information about each of the small displays, and to calculate the resolution of the large display based on the information. (Emphasis added.)*

Applicant carefully considered the combination of Li and Cok and was unable to find any disclosure that render obvious at least the details of the "gateway computer" recited in claim 12.

Li discloses a system that provides a large-display using several conventional components. The system includes a display cluster that includes multiple computers that each drive a projection device. (*See Figure 1 of Li.*) However, the Li system does not include a "gateway computer" to receive "identification information, location information, and resolution information about each of the small displays, and to calculate the resolution of the large display based on the information," as is recited in claim 12. Rather, each computer in the Li display cluster includes a "scene database" (*See page 34, first column, lines 1-2*) from which a respective computer retrieves video data for rendering and display. More specifically, each computer in the Li display cluster does its own reformatting of the video data for display on the large display. Thus, because Li recites that each of the computers in the display cluster is responsible for its own rendering and display, it follows that those computers would not distribute "configuration information" that enables the "gateway computer" to reformat video data, as is claimed in claim 12.

The Office has recognized Li does not disclose "a large display whose size and resolution are scalable by altering the number size of small displays," and has relied upon Cok to remedy this deficiency. Whether Cok remedies this deficiency is of little consequence, as Applicant has carefully considered Cok and has found that Cok does not remedy the Li deficiencies discussed in the preceding paragraph. Therefore, the combination of Li in view of Cok does not render claim 12 obvious.



Therefore, for at least the reasons stated above, Applicant respectfully requests the Office to reconsider and withdraw the rejection of claim 12.

**Dependent claims 13 and 16** depend from claim 12. The rejection with regard to these claims should be withdrawn by virtue of the dependency. Moreover, these claims recites features that, when taken together with those of claim 12, are not rendered obvious by Li in view of Cok.

**Claims 7 and 8** depend from claim 6 and hence incorporate the features of claim 6. As noted above, Li fails to disclose the limitations of claim 6. The added disclosures of Cok and Sakai do not remedy those shortcomings, nor does the rejection make any assertion to that effect. Therefore, the proposed combination of Li, Cok and Sakai fails to suggest the recitation of claim 1, from which claims 7 and 8 depend. Moreover, these dependent claims recites features that, when taken together with those of claim 6, and any intervening claim or claims, are not rendered obvious by the proposed combination.

Regarding the rejection of **claim 15**, Applicant notes that this rejection is improper. In particular, the Office rejects claim 12 in view of Li and Nishida, yet the base claim 12 is rejected in view of Li and Cok. The Office is requested to clarify this deficiency. Nonetheless, claim 15 depends from claim 12 and hence incorporates the features of claim 12. For at least this reason, the combination of Li and Nishida does not render claim 15 obvious.

In accordance with the foregoing, Applicant respectfully requests reconsideration and withdrawal of the 35 U.S.C. § 103(a) rejections.

Conclusion

In accordance with the foregoing remarks, Applicant believes that the pending claims are allowable and the application is in condition for allowance. Therefore, a Notice of Allowance is respectfully requested. Should the Examiner have any further issues regarding this application, the Examiner is requested to contact either of the attorneys listed below.

Respectfully Submitted,

Dated: June 10, 2008

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